

1 Stephen R. Cochell
2 Admitted Pro Hac Vice
srcochell@gmail.com
3 5850 San Felipe, Ste. 500
Houston Texas 77057
Telephone: (713) 436-8000
4 Facsimile: (213) 623-2000

5 Allan Grant (SBN#213658)
Grant's Law Firm
6 17351 Greentree Drive
Riverside, California 92503-6762
7 Telephone (888)937-7555
Facsimile (866)858-6637

8
9 Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF

10

11

12 UNITED STATES DISTRICT COURT
13
CENTRAL DISTRICT OF CALIFORNIA

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JASON EDWARD THOMAS
CARDIFF,

Defendant.

Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S EX PARTE
APPLICATION FOR AN ORDER
PERMITTING INTERNATIONAL
TRAVEL AND RETURNING HIS
PASSPORT**

*[Filed concurrently with Declaration of
Stephen R. Cochell and [Proposed]
Order]*

1 **EX PARTE APPLICATION**

2 Jason Cardiff has requested that counsel file this *ex parte* application seeking
3 permission to travel to Ireland from on or about October 31, 2024 for a period of
4 fourteen nights returning on or about November 14, 2024, and for the return of his
5 passport to permit that travel.

6 Mr. Cardiff has been released on a \$530,000 appearance bond, justified in the
7 amount of \$500,000 with full deeding of real property. His release conditions
8 include, among other conditions: a travel restriction to the Central District of
9 California and the Southern District of Texas; a curfew between the hours of 8:00
10 p.m. and 8:00 a.m.; and placement in the custody of third-party custodian, Attorney
11 Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties
12 in support of the bond. Ms. Murphy also deeded her home as collateral.

13 Mr. Cardiff is living with Attorney Cochell in Kingwood, Texas, and he is
14 being supervised by United States Probation Officer Jack Sherrod of the Southern
15 District of Texas.

16 Mr. Cardiff respectfully requests the Court's permission to travel to Ireland.
17 This request is made to allow Mr. Cardiff to assist his wife, Eunjung Cardiff, with
18 her ongoing medical needs during the time period and assist with their small child.
19 Mr. Cardiff also has scheduled necessary medical appointments for himself,
20 including a consultation with his cardiologist. During the ten-plus months of pretrial
21 release, Mr. Cardiff has consistently complied with all court orders and has
22 previously traveled both domestically and internationally with court approval
23 without incident. His record reflects no violations, demonstrating his commitment to
24 adhering to all conditions of his release. Mr. Cardiff will return to Texas as
25 scheduled and will maintain regular contact with his Pretrial Officer, Jack Sherrod,
26 while traveling. Additionally, Mr. Cardiff will supply Mr. Sherrod and Pretrial
27 Services with a full travel itinerary prior to his departure.

28 Mr. Cardiff proposes that he travel to Ireland on or about October 31, 2024,

1 for a period of fourteen nights and return to Texas on or about November 14, 2024,
2 with the travel duration not to exceed 14 nights out of the country, and for the return
3 of his passport to facilitate this travel. Additionally, it is requested that Mr. Cardiff's
4 curfew be lifted, and the electronic monitoring devices be removed during the
5 period of travel.

6 Sureties Lilia Murphy and Brian Kennedy do not oppose this request.

7 United States Probation Officer Jack Sherrod was contacted on October 23,
8 2024 and does not oppose this request.

9 DOJ Valerie Makarewiscz was contacted on October 23, 2024 and, in
10 response to Defendants' request for concurrence, simply stated: "The Government
11 opposes this request."

12
13 Dated: October 24, 2024

14
15 By: /s/ Stephen R. Cochell
16 Stephen R. Cochell

17 Attorney for Defendant
18 JASON EDWARD THOMAS CARDIFF

19
20
21
22
23
24
25
26
27
28